

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

**UNITED STATES OF AMERICA**

**v.**

**MICHAEL CLEMENCE**

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**No. 1:21-cr-99-LM**

**ASSENTED-TO MOTION FOR AN ORDER OF FORFEITURE**

The United States of America moves for an Order of Forfeiture for the following reasons:

1. The defendant, Michael Clemence, has pleaded guilty to an Indictment that charges him with possession of child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B), and has agreed to immediately forfeit his right, title and interest in the following assets: (A) one thumb drive, serial number BL0811NSSB; (B) one Samsung Galaxy S8+ cell phone, model SMG955UZKV, IMEI 357725085185248; (C) one Geek Squad thumb drive, serial number 5345GG040532M202B2; and (D) one SanDisk Ultra Backup 16GB, serial number BL0902NSAB, seized from the defendant. DN 25, ¶13.

2. Pursuant to Criminal Rule 32.2(b)(6)(C) and Rule G(4)(a)(i)(A) of the Supplemental Rules for Certain Admiralty or Maritime Claims and Asset Forfeiture Actions, notice of this proceeding was not published because the individual value of the asset is less than \$1,000.00. There are no known potential third party claimants.

3. Thus, the United States respectfully requests that this Court enter an Order forfeiting to the United States all of the defendant's interest in: (A) one thumb drive, serial number BL0811NSSB; (B) one Samsung Galaxy S8+ cell phone, model SMG955UZKV, IMEI 357725085185248; (C) one Geek Squad thumb drive, serial number 5345GG040532M202B2; and (D) one SanDisk Ultra Backup 16GB, serial number BL0902NSAB, pursuant to 18 U.S.C

§ 2253, and ordering the Department of Homeland Security, or any authorized federal law enforcement agency, to seize and maintain custody of the forfeited property and dispose of it in accordance with the law.

4. The defendant, Michael Clemence, assents to the relief sought in this motion through his signed plea agreement, DN 25, ¶ 13.

Respectfully submitted,

JOHN J. FARLEY  
United States Attorney

Dated: March 9, 2022

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